

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

MARIAN SNOW,

Plaintiff(s),

v.

GLOBAL CREDIT & COLLECTION
CORPORATION,

Defendant(s).

Civil Action No. 5:13-cv-721-FL

SWORN STATEMENT OF MICHAEL ALLTMONT

In support of defendant Global Credit and Collection Corporation's ("GCC") Response to plaintiff's Motion for Sanctions, and in support of GCC's anticipated Motion to Compel Plaintiff's Deposition, I state the following:

1. I am an attorney with the law firm Sessions, Fishman, Nathan and Israel, LLC ("SFNI"). I am over the age of 18 and competent to provide the following testimony. I made my initial appearance in this matter on October 24, 2014, more than a year after the lawsuit was filed.

2. Attached as **Exhibit A** is a true and correct copy of the GCC's Initial Disclosures that were provided by prior counsel, Burr & Forman, LLP. Prior to receipt of plaintiff's instant motion, plaintiff never advised that GCC's Initial Disclosures were purportedly missing or not served.

3. Attached as **Exhibit B** is a true and correct copy of an email from undersigned counsel to plaintiff, dated May 5, 2015.

4. Attached as **Exhibit C** is a true and correct copy of an email from plaintiff to Bryan Shartle, an attorney at SFNI, dated May 8, 2015.

5. On May 19, 2015, undersigned spoke with Amy Pagendam from Victory Verbatim Reporting Services in Toronto, ON. Mrs. Pagendam advised the reservation for this matter was cancelled on or about May 8, 2015.

6. Attached as **Exhibit D** is a true and correct copy of an email from plaintiff to undersigned, dated May 12, 2015.

7. Attached as **Exhibit E** is a true and correct copy of an email from undersigned counsel to plaintiff, dated May 13, 2015.

8. Attached as **Exhibit F** is true and correct copy of an email from plaintiff to undersigned, dated May 14, 2015.

9. Attached as **Exhibit G** is a true and correct copy of the email from undersigned to plaintiff, dated May 18, 2015, including a notice of deposition.

10. Attached as **Exhibit H** is a true and correct copy of an email from plaintiff to undersigned, dated February 20, 2015 at 11:24pm.

11. Attached as **Exhibit I** is a true and correct copy of an email from undersigned to plaintiff, dated March 16, 2015.

12. Attached as **Exhibit J** is a true and correct copy of a May 14, 2015 correspondence and discovery responses from undersigned counsel to plaintiff

(documents designated confidential and audio recordings omitted). The package was delivered Fed Ex overnight to an address in Tuscaloosa, Alabama provided by plaintiff.

13. Attached as **Exhibit K** is a true and correct copy of a May 19, 2015 email exchange between Bryan Shartle to plaintiff.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED ON: May 22, 2015

/s/Michael D. Alltmont
MICHAEL ALLTMONT